EXHIBIT F

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March 9, 2020

<u>Via E-mail</u>
nchatterjee@goodwinlaw.com

Neel Chatterjee
Goodwin Proctor LLP
601 Marshall Street
Redwood City, California 94063

      Re: Notice of Infringement of BlackBerry Patents; Offer to License

Dear Neel:

I write in response to your February 26, 2020, letter and to put MobileIron on notice of additional BlackBerry patents we believe are infringed by MobileIron.

First, regarding the Facebook litigation, the only patent in common between BlackBerry's August 26, 2019, letter to MobileIron and the patents in suit against Facebook is US 7,372,961. The '961 Patent not only survived an IPR petition by Facebook[1] but also survived a summary judgement motion alleging invalidity under *Alice* and non-infringement. Second, MobileIron's letter references the Good litigation with specific reference to the '016 patent. However, a California jury found that Good did not directly or indirectly infringe the '016 patent. *See Good Tech. Corp. v. MobileIron, Inc.*, 5:12-cv-05826-PSG, D.I. 543 (N.D. Cal., Aug. 4, 2015) (jury verdict). You were lead counsel for MobileIron in the Good matter so you should know that MobileIron's theory of infringement is not viable. Your letter neither acknowledges that MobileIron lost its infringement case against Good nor does it provide any evidence or analysis regarding how you would sue BlackBerry in good-faith on the '016 patent given its history. Also, MobileIron's per user royalty rate appears to be based on a seriously flawed methodology[2] from the Good litigation, which has been heavily criticized by others. *Id.* at D.I. 296 (Good's *Daubert* challenge). While MobileIron's expert narrowly escaped Good's *Daubert* challenge, even the Court was "skeptical of Eichmann's conclusion" that MobileIron was entitled to 100 percent of Good's incremental profits. *Id.* at D.I. 463. It is unlikely to survive a challenge again and most importantly, would never be approved by the Federal Circuit.

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[1] *Facebook, Inc., et. al. v. BlackBerry Ltd.*, IPR2019-00923, Paper 14 (P.T.A.B. Nov. 5, 2019).
[2] https://www.law360.com/articles/683481/the-latest-inappropriate-reasonable-royalty-rule-of-thumb.

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In addition to the patents identified in our initial letter to MobileIron in August 2019, BlackBerry further believes that MobileIron infringes additional patents by making, using, importing, selling, and/or offering to sell MobileIron products in or into the United States or causing others to do the same. Below is a non-exclusive list of patents identified to date:

U.S. Patent Number 9,922,175	Controlling access by code
U.S. Patent Number 10,032,007	Controlling access by code
U.S. Patent Number 10,437,967	Code signing system and method
U.S. Patent Number 8,065,436	System and method for accessing information processor services for a mobile communication device
U.S. Patent Number 8,134,954	System and method for controlling configuration settings for mobile communication devices and services
U.S. Patent Number 10,476,865	System and method for controlling configuration settings for mobile communication devices and services
U.S. Patent Number 9,307,443	System and method for remotely controlling mobile communication devices
U.S. Patent Number 10,298,584	System and method for secure control of resources of wireless mobile communication devices
U.S. Patent Number 7,142,848	Method and system for automatically configuring access control
U.S. Patent Number 7,986,939	System and method for handling restoration operations on mobile devices
U.S. Patent Number 8,130,957	System and method for securing data
U.S. Patent Number 8,831,209	Conference call dialing
U.S. Patent Number 8,423,011	Wireless handheld device, system, and method of detecting and storing email settings
U.S. Patent Number 7,653,402	Coordinated changing of email settings on wireless electronic devices and wireless networks
U.S. Patent Number 9,537,830	System and method to provide built-in and mobile VPN connectivity

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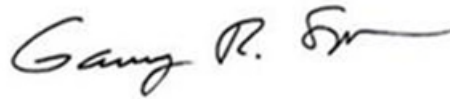|	
U.S. Patent Number 9,537,896	Method for providing wireless application privilege management
U.S. Patent Number 10,462,189	Method for providing wireless application privilege management
U.S. Patent Number 9,531,730	Apparatus, and associated method, for alerting user of communication device of entries on a mail message distribution list
U.S. Patent Number 8,670,144	Apparatus, and associated method, for facilitating background processing of push content
U.S. Patent Number 9,154,913	Disabling operation of features on a mobile communication device based upon location
U.S. Patent Number 10,162,983	Selectively wiping a remote device
U.S. Patent Number 10,540,520	Selectively wiping a remote device
U.S. Patent Number 8,516,095	Remote administration of mobile wireless devices
U.S. Patent Number 7,472,276	Data card verification system
U.S. Patent Number 8,462,944	Method of public key generation
U.S. Patent Number 8,327,112	Processing system implementing variable page size memory organization using a multiple page per entry translation lookaside buffer
U.S. Patent Number 8,904,544	Restrictions to data transmission
U.S. Patent Number 9,065,771	Managing application execution and data access on a device
U.S. Patent Number 8,667,306	Automatic Security Action Invocation for Mobile Communications Device
U.S. Patent Number 9,720,915	Presenting Metadata from Multiple Perimeters
U.S. Patent Number 9,306,948	Method and Apparatus for Separation of Connection Data by Perimeter Type
U.S. Patent Number 8,904,550	Selection of sandbox for initiating application

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   Please note that the patents identified in this letter are merely illustrative examples of the patents in BlackBerry's portfolio that are relevant to MobileIron's businesses and are not intended to convey the totality of the relevant patents in BlackBerry's portfolio.

   This letter constitutes notice of patent infringement under U.S. patent law, in particular 35 U.S.C. § 287(a). BlackBerry remains willing to negotiate with MobileIron to reach a license for BlackBerry's patented technology. If you have any questions, please do not hesitate to contact me.

          Sincerely,

          Gary R. Sorden

GRS:jrp